

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Keith Raniere,

Plaintiff,

-against-

Merrick Garland, et al.,

Defendants.

Case No. 4:22-cv-00561-RCC

**MOTION TO REQUEST EXTENSION OF DEADLINE
TO FILE RESPONSE IN OPPOSITION TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

1. Plaintiff Keith Raniere, through his undersigned counsel, hereby moves to request the Court for an order granting a reasonable extension of the deadline to submit a Response in Opposition to Defendants' Motion for Summary Judgment related to the above-captioned case, which is currently due on to September 18, 2023, to October 16, 2023, or any date thereafter that the Court deems acceptable.

2. Mr. Raniere's incarceration poses logistical challenges to enable him to easily participate with our office in the drafting of his response. To that end, although we have attempted to contact Mr. Raniere to discuss a draft of our Response, we have found it very difficult to reach and communicate with our client, and, as such, we have not yet had an opportunity to discuss its contents in its entirety with him. We feel it is imperative to do so before filing. As such, we are requesting an additional 14-day adjournment to file our Response.

3. This extension is sought to afford additional time for the undersigned counsel to engage in further consultation with Plaintiff regarding the filing of his Response. Although this is the second request by the undersigned counsel on behalf of Plaintiff for an extension to file a Response in Opposition to Defendants' Motion for Summary Judgment, we feel it necessary

considering his current circumstances and the difficulties they poses to facilitating attorney-client communication. Barring any unforeseen circumstances, we do not anticipate any further requests for an extension to file this Response. Therefore, the undersigned counsel respectfully requests the Court for a reasonable extension to file the Response.

4. Based on the foregoing, Plaintiff respectfully requests the date to file his Response in Opposition to Defendants' Motion for Summary Judgment be extended to October 16, 2023, or any date thereafter that the Court deems convenient.

Date: September 15, 2023

Respectfully submitted,

/s/ Arthur L. Aidala
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